

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems)	
)	

Interim E911 Phase II Deployment Report of Iowa Wireless Services, L.P.
and related licensees

Iowa Wireless Services, L.P. and the related licensees listed in Attachment A ("Iowa Wireless"), hereby submits the following report as required in the Commission's July 26, 2002 Order in CC Docket No. 94-102.

Background

Iowa Wireless is a small Personal Communications Services ("PCS") licensee providing service in rural eastern Iowa and western Illinois. As a non-nationwide carrier, Iowa Wireless meets the Commission's definition of a Tier III carrier. Iowa wireless utilizes GSM technology throughout its PCS network.

1. The number of Phase I and Phase II requests from PSAPs

Phase I

Iowa Wireless received a request for Phase I from the State of Iowa Emergency Management Division and immediately responded to the request. Phase I E911 is operational with no problems throughout its Iowa serving area.

In Illinois, Iowa Wireless has received requests for E911 Phase I from three counties. Henry county, is fully operational and is providing Phase I with no problems. In the other two counties, Whiteside and Rock Island, Iowa Wireless has complied with the Phase I request and implemented all of the necessary network provisions. The PSAPS are experiencing some difficulties and are not operational for Phase I. Iowa Wireless is actively working with the parties to resolve the problems.

Iowa Wireless has responded to all Phase I requests. There are no outstanding requests and no requests were judged as invalid.

Phase II

Iowa Wireless has not received a request for Phase II E911

2. E911 Phase II Technology

Iowa Wireless has tentatively chosen a network location technology, Up-link-Time Difference of Arrival (U-TDOA) Phase II solution. U-TDOA is the solution chosen by other GSM providers such as T-Mobile¹ and Cingular Wireless². U-TDOA technology locates a wireless phone by comparing the time it takes a mobile station's radio signal to reach several location measurement units. It can locate any wireless phone without requiring special hardware or software in the phone itself.

3. Status on ordering and/or installing necessary network equipment

Iowa Wireless has not installed or ordered any Phase II equipment. At this Time Iowa Wireless is in discussions with the providers of location-based technologies to determine the vendor and equipment necessary to meet the Phase II requirements.

¹ T-Mobile USA, Inc. and TruePosition, Inc. press release July 23, 2003

² Cingular Wireless and TruePosition, Inc. press release June 20, 2003

4. If the carrier is pursuing a handset-based solution, the report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:

Iowa Wireless is not pursuing a handset-based solution. In the future if it becomes evident that the network-based solution will not meet the Commissions requirements or proves to be technically or economically infeasible, Iowa Wireless will file a follow-up report with the Commission.

5. The estimated date on which Phase II service will first be available in the carrier's network:

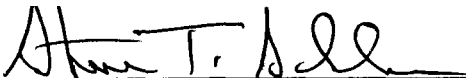
At this time Iowa Wireless has not received a request for Phase II service and therefore cannot provide a date certain when Phase II will be available. When a request for Phase II is received, Iowa Wireless will make every effort to implement Phase II within the required time frames of the Commissions Orders.

6. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

Iowa Wireless believes it will be able to meet the Commissions implementation dates for network-based location technologies³.

³ FCC 02-210, Licensees who employ a network-based location technology shall provide Phase II 911 enhanced service to at least 50% of the PSAP's coverage area or population beginning September 1, 2003 or within six months of a PSAP request, whichever comes later; and to 100%

Respectfully submitted,
Iowa Wireless Services L.P.

By _____
Steven T. Schuler
Chief Financial Officer

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of the PSAP's coverage area or population by September 1, 2004 or within 18 months of such a request, whichever is later.

Attachment A Iowa Wireless Related Licensees

TRS Number	IWS Consortiums	TRS Number	IWS Partners
Benton/Linn Wireless L.L.C.		801006	Marne & Elk Horn Telephone Co.
806835	Atkins Telephone Co., Inc.	801036	Bernard Telephone Co., Inc.
801720	Farmers Mut. Tele. Coop.-Shellsburg	801039	Ruthven L.L.D., Inc
801171	Palo Coop. Telephone Assn.	801042	Dixon Telephone Company
804135	Prairieburg Telephone Co., Inc.	801097	Goldfield Telephone Company
801654	Coon Creek Telephone Company	801129	Webb-Dickens Telephone Corp.
801711	Keystone Farmers Coop. Tele. Co.	801141	LaMotte Telephone Company, Inc.
801156	Van Horne Coop. Telephone Co.	801159	Swisher Telephone Company
803637	Springville Coop. Tele. Assn., Inc.	801282	Cooperative Telephone Company
806493	Martelle Coop. Telephone Assn.	801525	South Slope Coop. Tele. Co., Inc.
Carroll County Wireless, LLP		801603	Minerva Valley Telephone Co., Inc.
809875	Breda Telephone Corporation	801606	Montezuma Mutual Telephone Co.
806545	Arcadia Telephone Cooperative	801633	Butler-Bremer Mutual Telephone Co.
801018	Templeton Telephone Company	801807	Modern Coop. Telephone Co.
Cedar County PCS LLC		801885	United Farmers Telephone Co.
801594	Clarence Telephone Company, Inc.	802161	Palmer Mutual Telephone Co.
801630	Mechanicsville Telephone Co.	802165	Clarksville Telephone Company
Community Digital Wireless		802350	Webster-Calhoun Coop. Telephone Assn.
804732	Northeast Iowa Tele. Co.	802398	DC Communications
802305	EBTC	802422	Norway Rural Telephone Company
804564	Hawkeye Telephone Co.	802428	Northwest Iowa Telephone Company
806922	Oran Mutual Telephone Company	802452	Ayshire Farmers Mutual Tele. Co.
803838	Readlyn Telephone Co.	802500	Jefferson Tele. Co.
Fibercomm LC		803160	Center Junction Tel. Co., Inc.
807288	C-M-L Telephone Cooperative Assn.	803628	River Valley Telephone Coop.
802053	Hill Telephone Company, Inc.	804405	Shell Rock Telephone Co.
804468	Hospers Telephone Company	804414	Corn Belt Telephone Company
801123	Mutual Telephone Company	804441	Woolstock Mutual Tele. Assn.
801126	Northern Iowa Telephone Company	804612	Northwest Telephone Coop. Assn.
	Peoples Telephone Company	804825	Onslow Coop. Telephone Assn.
803166	West Iowa Telephone Company	805404	Miller Telephone Company
807036	Western Iowa Telephone Assn.	805617	Sac County Mutual Telephone Co.
FWC Communications		805641	Danville Mutual Telephone Co.
801903	Winnebago Coop. Telephone Assn.	805707	Ventura Telephone Co., Inc.
805704	Clear Lake Independent Tele. Co.	805863	Farmers Tele. Co. - Nora Springs
805860	Farmers Mutual Tele. Co.-Nora Springs	805908	Massena Telephone Company
The Guthrie Group		806691	Radcliffe Telephone Co., Inc.
809740	Casey Cable Company	807087	Rockwell Telecom, Inc.
809120	Coon Valley Cellular	807114	Ellsworth Coop. Telephone Co.
808659	Panora Coop. Tele. Assn., Inc.	807303	Stratford Mutual Telephone Co.
811454	Prairie Telephone Co., Inc.	807981	Cooperative Telephone Exchange
Wapsi Wireless		808191	Fenton Coop. Tele. Co.
801351	Cascade	808257	Lone Rock Coop. Telephone Co.
801936	Lost Nation-Elwood Telephone Co.	808578	Farmers Tel. Co.-Batavia
806640	CST Communications, Inc.	808774	The Burt Telephone Company
811438	Farmers & Businessmen's Tele. Co.	808780	Titonka Telephone Company
808964	Grand Mound Coop. Telephone Assn.	808854	Brooklyn Mutual Telephone Co.
801120	Preston Telephone Company	808878	Olin Telephone Co., Inc.
807225	Miles Coop. Telephone Assn.	808974	Farmers Mutual Tele. Co.-Stanton
Washington County PCS Consortium		809020	Baldwin-Nashville Telephone Co.
809780	Kalona Co-op Telephone Company	809068	Hubbard Coop. Telephone Assn.
809046	Sharon Telephone Co.	809078	Ogden Telephone Company
801846	Wellman Coop. Telephone Assn.	809080	Dumont Telephone Company
		809142	Andrew Telephone Company
		809204	Schaller Telephone Co.
		809238	Barnes City Cooperative Tele. Co.
		809630	Scranton Telephone Company
		809808	Jordon-Soldier Valley Coop., Tele.
		811442	Lehigh Services, Inc.
		811460	Wilton Telephone Company
		814653	Huxley Cooperative Telephone Co.

AFFADAVIT OF STEVEN T. SCHULER

I, Steven T. Schuler, hereby declare under penalty of perjury, I am the Chief Financial Officer of Iowa Wireless Services L.P. I have read the foregoing Interim E-911 Report and all statements of fact set forth therein are true and correct to the best of my knowledge, information, and belief, and are made in good faith.

Dated this 29th day of July, 2003

A handwritten signature in black ink, appearing to read "Steven T. Schuler", is written over a horizontal line.

Steven T. Schuler
Chief Financial Officer
Iowa Wireless Services L.P.